AGNICO EAGLE

December 12, 2018

Michelle Blade
Regional Coordinator, Water Resources, Nunavut Regional Office
Crown-Indigenous Relations and Northern Affairs Canada
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Re: NWB File No. 2AM MEA1526- In-Pit Disposal: Flooding Strategy.

Dear Ms. Blade,

Please find below Agnico Eagle's response to CIRNACS request for additional information related to the flooding strategy of the Goose and Portage pits. For this response, we will be referencing NRCan-05. The response package (NRCan-05) was submitted to the Nunavut Water Board and Nunavut Impact Review Board on August 17, 2018.

Agnico Eagle considers that this represents the flooding strategy as requested by CIRNAC. NRCan confirmed to Agnico Eagle that NRCan-05 comment/Final Recommendation was resolved during the meeting in Ottawa on September 25, 2018 and this information has been used to complete the updates of the hydrogeological model (Versions 3 & 4). Agnico Eagle has not received further comments regarding this response and as such, our understanding is that this issue has been resolved.

Should you have any questions or require further information, please contact the undersigned or Michel Groleau at Michel.groleau@agnicoeagle.com

Regards,

Jamie Quesnel
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819.856.0821
Superintendent – Permitting and Regulatory Affairs – Nunavut

copy to: Nunavut Water Board

Interested Party:	**Natural Resources Canada (NRCan)**	**Rec No.:**	**NRCAN-05**
Re:	**Water level controls during in-pit deposition periods**		

Final Written Submission / Recommendation Made By Interested Party

NRCan recommends that the proponent should clearly state the anticipated pit water levels during Periods 4 and 5 and resolve the apparent contradictions between pit water levels and flooding of the areas surrounding the pits. The proponent should state when the area surrounding the pits will be flooded and whether this will result from natural drainage or pumping, or breaching of the dikes.

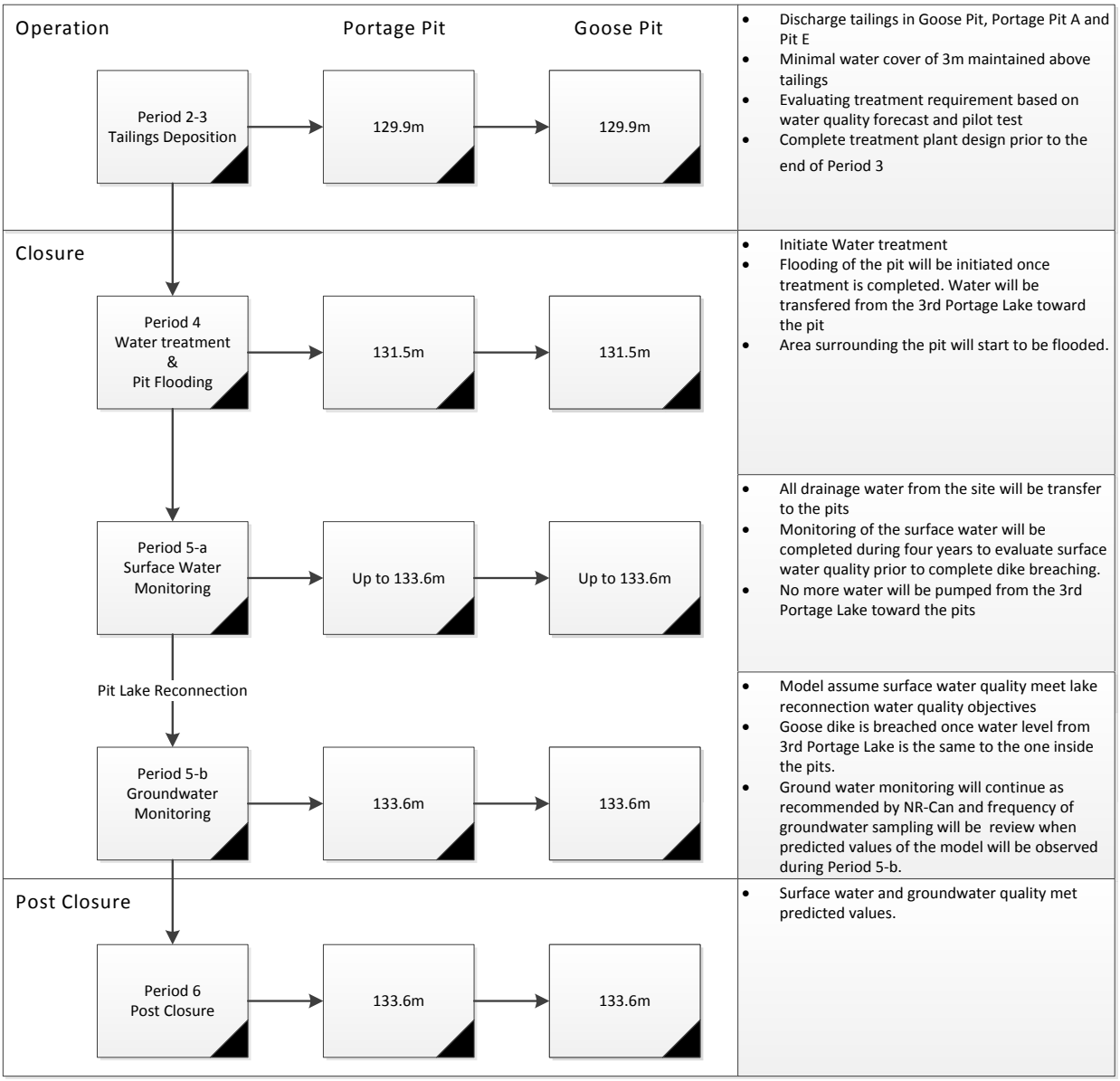
NRCan recommends that "post-closure" groundwater contaminant simulations towards Second Portage Lake should begin when pit water levels exceed those of the Second Portage Lake.

Agnico Eagle's Response to Final Submission / Recommendation

NRCAN #5 Response

Agnico Eagle agrees to provide further information to address the NRCan recommendation and has developed the flowchart presented on the Figure 5.1 to summarize the closure sequence (Period 4 and 5) with the water elevation at the end of each phases within the pits. Water elevations presented in this flowchart are different than the tailings beach elevation which will reach maximum elevation 125m. Also, Agnico Eagle would like to clarify that the average pit crest elevation is 130m. The closure monitoring period (Period 5) will now have two segments to comply with Information Request NRCan-10 made in July 2018.

Figure 5.1: Closure sequence flowchart



Agnico Eagle agrees with NRCan recommendation that “post-closure” groundwater contaminant migration towards Second Portage Lake should begin when pit water levels exceed those of the Second Portage Lake and will integrate this recommendation in the Version 3 hydrogeological model (sensitivity analysis of Version 2 (SNC, 2018a)). For clarification, the assumption made in the Versions 1 (SNC, 2017) and 2 hydrogeological models was that “post-closure” groundwater contaminant migration towards Second Portage Lake starts once water level within the pits reach 3rd Portage Lake elevation (end of Period 5a).

Based on review by SNC-Lavalin and Golder of recommendation NRCAN-05, the Version 3 hydrogeological model (sensitivity analysis of Version 2) result to the environment will be similar to Versions 1 and 2 hydrogeological model results. As it will take about 1.5 to 2 years to raise the water level from 132.9 to 133.6m, this modification to the model will lead to a minor change in the model output, but not change to

the impacts to the environment. Agnico Eagle considers that the Version 1 and 2 contaminant transport modelling results for post closure scenarios provided to NIRB are sufficient for the assessment of potential effects of the project. Again, Agnico Eagle will incorporate this recommendation in its updated model to be submitted to the NWB.

The recommendation NRCAN-05 is an input to the model which is related to NRCAN-7 and NRCAN-11 recommendations.

The results of Version 3 hydrogeological model (sensitivity analysis of Version 2) will be submitted to the NWB as part of the NWB's consideration of the modification request during the week of September 17, 2018.